

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BOY SCOUTS OF AMERICA AND  
DELAWARE BSA, LLC,<sup>1</sup>

Debtors.

Chapter 11

Case No. 20-10343 (LSS)

(Jointly Administered)

OFFICIAL TORT CLAIMANTS'  
COMMITTEE OF BOY SCOUTS OF  
AMERICA AND DELAWARE BSA, LLC,

Plaintiff,

v.

BOY SCOUTS OF AMERICA AND  
DELAWARE BSA, LLC,

Defendants.

Adv. Pro. No. 21-50032 (LSS)

**CERTIFICATION OF COUNSEL REGARDING DEBTORS' PROPOSED  
SCHEDULING ORDER**

Undersigned counsel to the Boy Scouts of America and Delaware BSA, LLC (together, the "Debtors") hereby certifies as follows:

1. On January 8, 2021, the Official Tort Claimants' Committee of Boy Scouts of America and Delaware BSA (the "Plaintiff") commenced the above-captioned adversary proceeding by filing a *Complaint for Declaratory Judgment* [D.I. 1] (the "Complaint") against the Debtors.

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<sup>1</sup> The Debtors in the chapter 11 cases, together with the last four digits of each Debtor's federal tax identification number, are as follows: Boy Scouts of America ("BSA") (6300) and Delaware BSA, LLC ("Delaware BSA") (4311). The Debtors' mailing address is 1325 West Walnut Hill Lane, Irving, Texas 75038.

2. The deadline to answer, move, or otherwise response to the Complaint was March 3, 2021 (the “Response Deadline”). The Response Deadline was extended to April 2, 2021 [D.I. 5], April 16, 2021 [D.I. 10], and April 23, 2021 [D.I. 13].

3. On April 23, 2021, the Debtors filed the *Debtors’ Answer to the Tort Claimants’ Committee’s Complaint for Declaratory Judgment* [D.I. 16].

4. On April 23, 2021, JP Morgan Chase Bank, National Association (“JP Morgan”) filed the *Motion to Intervene of JP Morgan Chase Bank, National Association* [D.I. 15].

5. A pretrial conference for this matter has been scheduled for May 19, 2021 at 10:00 a.m. (ET) (the “Hearing”).

6. Pursuant to L.R. 7016-1(d), the Debtors hereby submit the proposed scheduling order (the “Proposed Order”), attached hereto as **Exhibit A**.

7. The Proposed Order has been circulated to the Plaintiff, JP Morgan, and the Official Committee of Unsecured Creditors. These parties have not agreed to the Proposed Order.

8. Accordingly, the Debtors will present the Proposed Order at the Hearing.

*[Remainder of Page Intentionally Left Blank]*

Dated: May 17, 2021  
Wilmington, Delaware

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Eric W. Moats

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